

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

UNITED STATES OF AMERICA

v.

Hassanbunhussein Abolore Lawal

a/k/a Bellajannet28

a/k/a Bellajannet30

a/k/a Aliceconnor566

a/k/a Lawal Hassan

a/k/a Hassan Lawal

Case No. _____

Filed Under Seal

MOTION TO SEAL

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves this Court to seal the application for a Criminal Complaint and Arrest Warrant, the Affidavit in support of the same, and any Arrest Warrant then issued, each of which were submitted by the undersigned and FBI Task Force Officer Robert M. Hamilton. The purpose of the Government's request is to protect the information contained within these documents to avoid premature disclosure of the ongoing investigation, except that working copies should be made available to the United States Attorney's Office, the FBI, and any other law enforcement personnel participating in this investigation as designated by the United States Attorney's Office.

This investigation is ongoing and not all subjects are in custody at this time. The primary defendant also is not in U.S. custody at this time. The investigation involves numerous likely violations of federal statutes related to fraud, conspiracy, child exploitation, and extortion, including targets in the United States. Based on the nature of the investigation, the seriousness of the potential charges, and the length of imprisonment the defendant and co-conspirators may face, any notice of the investigation at this

time would seriously jeopardize the investigation and risk both the destruction of evidence, change in patterns, and flight, including as it relates to any co-conspirators in the United States or Nigeria, as described in the agent's affidavit in support the Criminal Complaint. In addition, these documents discuss sensitive personal information related to the sexual abuse and suicide of a minor, the production of child pornography, and the attempted extortion of another minor.

Given the above, the United States respectfully submits that the need to protect the integrity of the ongoing investigation and the concerns referenced above outweighs the public's limited interest in access to materials related to an ongoing investigation. This Court has the inherent authority to seal these documents. *See* Baltimore Sun v. Goetz, 886 F. 2d 60 (4th Cir. 1988); Media General Operations, Inc. v. Buchanan, 417 F.3d 424 (4th Cir. 2005); In re Application of the United States for an Order Pursuant to 18 U.S.C. § 2703(d), 707 F.3d 283, 292-95 (4th Cir. 2013).

Based on the foregoing, the Government respectfully requests the Court order the Criminal Complaint, the affidavit in support of the same, any Arrest Warrant issued, and this motion and any Order to Seal be filed under seal for one year unless otherwise ordered by the Court for good cause shown.

Respectfully submitted,

ADAIR F. BOROUGHES
UNITED STATES ATTORNEY

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